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Attorneys for Doris Kaelin,
Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA –SAN JOSE DIVISION

In re KIMBERLY A. SCHATZ,)	CASE NO. 19-52465 SLJ
)	Chapter 7
)	
Debtor.)	REQUEST FOR ENTRY OF ORDER
)	AUTHORIZING TRUSTEE TO ABANDON
)	ESTATE'S INTEREST IN REAL
)	PROPERTY AND FORECLOSURE
)	PROCEEDS
)	
)	

Kari Bowyer, Trustee in Bankruptcy ("Trustee") of the estate of Geraldine Rose Rosine ("Debtor"), respectfully represents:

1. On June 17, 2020, the Trustee caused to be served on the Debtor, Debtor's counsel, the Office of the U.S. Trustee, and all creditors in the above-captioned case, a *Notice of Abandonment of Real Property and Foreclosure Proceeds* ("Notice") [Dkt. 65].

2. The 14-day time period within which to file objections or request a hearing on the Notice, has passed. No objections or requests for hearing have been received by the Trustee or her counsel, and as of the date of the filing of this request, none have been filed with the Court.

WHEREFORE, the Trustee requests entry of an order authorizing the abandonment of the estates' interest in the real property located at 4939 Arundel Court, San Jose, CA 95136 is deemed abandoned pursuant to 11 U.S.C. section 554 and the proceeds in the amount of approximately \$88,625 remaining from the pre-petition foreclosure of the real property located at

2863 Quinto Way, San Jose, CA 95124 and currently held by the Santa Clara Superior Court.

Dated: July 2, 2020

GORDON REES SCULLY MANSUKHANI, LLP

By: /s/ Sandi M. Colabianchi

Sandi M. Colabianchi

Attorneys for Doris Kaelin, Chapter 7 Trustee